

PRIVACY POLICY (Website Version)

About this policy

Your privacy is important to us.

This privacy policy explains how Cultural Perspectives will use and manage personal information. This includes personal information you provide or we collect.

We must follow the Australian Privacy Principles in the Australian Government's *Privacy Act 1998 (Cth)*. We also follow the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

We may, from time to time, review and update this policy to:

- support new laws and technology
- support changes to the ways we work
- make sure it remains appropriate to changing laws.

This policy assumes you are resident in Australia. If you are resident in the United Kingdom or Europe, please contact us for more information about how we will treat your personal information.

Personal information

Types of personal information we collect

We collect and keep personal information that may be sensitive, such as:

- the behaviours and opinions people share during interviews, focus groups or other data collection activities
- addresses of contractors and research participants
- bank details of contractors and research participants
- email addresses
- company details – like an Australian Business Number (ABN)
- contact details of companies and contractors – like phone numbers
- eDM subscriptions
- social media account details – like Facebook and LinkedIn.

We explain what 'sensitive information' means under the heading [Treatment of sensitive information](#).

How do we collect personal information?

Personal information you provide

We will generally collect your personal information by phone calls, interviews, focus groups, forms, meetings etc.

You have the right not to use your name or to use a fake name when you provide your information. However, this means we will not be able to offer you specific help or services. Unless you give us your name, we will only be able to offer you general answers to your enquiry.

Personal information other people provide

Sometimes a third party will provide your personal information to us. For example, a third party might be a service provider who wants us to check the service they run. They might give us information about you so we can ask you about their service.

Personal information in employee records

Under the *Privacy Act 1998 (Cth)*, the Australian Privacy Principles do not apply to an employee record. Because of this, this policy does not apply to how we manage and use employee records. This includes employee records for people who are or were in a working relationship with us. However, we must follow the Health Privacy Principles under the *Health Records and Information Privacy Act 2002 No 71*.

How will we use the personal information you provide?

We use personal information for the main reason we collected it. We also might use it for something that:

- is reasonable
- is closely connected to the main reason
- you have agreed to.

Job applicants, staff members and contractors

Our reason for collecting personal information from job applicants, staff members and contractors is to:

- check their experience and skills
- reach out to them about working with us.

We will use this personal information:

- for insurance purposes
- for payroll purposes
- to meet the laws we must follow.

There are times where we receive job applications without asking. When this happens, we will follow what the laws say in the *Privacy Act 1998 (Cth)*.

Volunteers

We will collect and use personal information for volunteers who work with us. This includes volunteers who support us to run activities. We use this personal information to allow us and volunteers to work together.

Direct marketing

We may use your personal information for direct marketing. Direct marketing is when a company reaches out to you directly to sell or offer a service. We will only use your personal information if you are expecting to receive direct marketing from us. You can change your mind about direct marketing once we reach out to you.

If we collect your personal information elsewhere and plan to use it, we will remind you where you gave consent to direct marketing before. We will also give you the choice to change your mind about taking part in marketing. We will always get your consent to use sensitive information in any of our direct marketing.

Remarketing

We use remarketing services from time to time to advertise on behalf of a client. Remarketing services will display ads to you based on what parts of a website you have viewed. They will do this by placing a cookie on your web browser.

Remarketing services allow us to tailor our marketing to suit your needs better. For example, it lets us only display ads that are relevant to you.

Video surveillance

We may use video surveillance for security purposes. The only people who can use this footage will be us and the providers of our security services. We do not use video surveillance for other reasons and the public cannot view this footage. We do not have any surveillance cameras in any bathrooms or change rooms.

Who might we share personal information with?

We might share the personal information we collect, including sensitive information, with:

- government departments
- people who provide services to Cultural Perspectives
- lawyers – when we are legally required to
- anyone who can legally ask us to share information – like the police if they think a crime has happened.

How do we manage and keep your personal information safe?

Our staff must respect people's privacy and personal information.

We have steps in place to protect personal information from misuse, loss, unauthorised access, modification, interference or disclosure. We have a number of ways to keep personal information safe. This includes locked storage of paper records and passworded access rights to computerised records.

We have a plan about what to do if there is a data breach. We will follow this plan in the unlikely event of a privacy or data breach.

How do we send information overseas?

We will not send your personal information outside of Australia without:

- getting your consent
- or
- following the Australian Privacy Principles or other applicable privacy legislation.

We do not use overseas providers of IT services, including servers and cloud services.

Treatment of sensitive information

When we talk about sensitive information, we mean information relating to a person's:

- race and ethnicity
- political opinions
- religion
- membership with a work union or other professional association
- sexual orientation
- criminal record
- health information.

We will only use or share sensitive information for the reason we collected it, or for a reason closely connected to the main reason.

We will only use or share sensitive information for other reasons if:

- you agree to it
- or
- the law says we can.

Website analytics

We collect data using Google Analytics and WP Statistics. We need this data to understand how you use our website so we can improve:

- its design
- the way it works
- the information it shares.

Google Analytics will collect:

- your IP or server address
- the web browser type and version you use – like Google Chrome
- your general location
- the time and date you visited our website
- the pages you visited on our website.

Pages on our website might use Google Analytics software. This is not a secret to the user, as the software uses JavaScript code in the source HTML of the web page. This JavaScript stores a first-party cookie in your browser, which contains a unique identifier. This lets Google Analytics track the number of unique visitors to the site. The unique identifier does not identify a user personally.

We do not and will not match any data Google Analytics collects with personal information. If you are concerned about using these tools, you can set your web browser to send a 'Do Not Track' request with your browsing traffic.

WP Statistics does not collect personal information. The data it collects does not identify your device across our website. WP Statistics tracks overall trends in website traffic, not specific people who visit.

Website cookies

Like many websites, our website might use cookies from time to time.

Websites use cookies to keep contact with a user as they browse. A cookie is a small data file that websites save on the web browser on your computer. Cookies let us recognise a user as they use our website. For example, we may use cookies to record that a user:

- has visited a particular section of the website
- has used a certain version of a web browser.

Cookies can help us improve the way our website works. They can also help us make the experience of our website more efficient, enjoyable or personalised. For example, cookies let us make sure your browsing session is consistent if you leave a page and come back later.

Cookies do not:

- need to identify you or record any personal information
- store any personal information.

You can choose to stop using cookies by changing the settings on your web browser.

We do not use cookies on the CIRCA Research website.

Access to your own personal information

We aim to make sure the personal information we collect is accurate, complete and up-to-date. You can update the personal information we have about you by contacting our Privacy Officer at any time.

The Australian Privacy Principles and the Health Privacy Principles mean that we cannot keep personal information longer than we need. In particular, the Health Privacy Principles explains the length of time organisations can keep health records for.

You have the right to check what personal information we have about you.

You also have the right to access and update any personal information we have about you. The *Privacy Act 1998 (Cth)* and the *Health Records and Information Privacy Act 2002 No 71* support these rights. These acts also explain the exceptions that can affect these rights. To request access to any information we have about you, please contact our Privacy Officer in writing.

We might need you to prove your identity and state what information you need. There is no cost for accessing your personal information or making an update, but we might charge a cost to collect and copy any material. If you want access to a lot of information, we will let you know that the cost will likely increase.

How long will we keep your information?

Our policies state that any of your personal information we no longer need will be de-identified or destroyed. This means we will either:

- remove any information that says who you are
or
- safely get rid of your information.

However, we often keep personal information for marketing. This happens when you have given us consent to use your information this way.

Questions and privacy complaints

For more information about the way we manage personal information, please contact our Privacy Officer.

Privacy Officer: Deanna Chapman

Phone number: 02 8585 1307

Email address: privacy@culper.com.au

You should also contact our Privacy Officer if you:

- have any concerns
- have any complaints
- think there has been a breach of privacy.

Our Privacy Officer will first call you on the phone to deal with the issue. If we have not solved your concern in a way you are happy with, we will meet with you to discuss it further. If you are still not happy with our response to your complaint, you can ask someone else to review it. You must send your complaint to the Office of the Australian Information Commissioner within 30 days of our meeting. You can send your complaint by:

- email – enquiries@oaic.gov.au
- phone – 1300 363 992
- fax – +61 2 9284 9666.

Policy review

A Cultural Perspectives Group executive must review this policy every 2 years.

Policy approval

Development date	Approval date	Review date	Policy owner
19 May 2023	19 May 2023	January 2025	Pino Migliorino, Managing Director
		January 2027	